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**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	CASE NO.: 24-32525
JAMISON HAMLIN DYER	§	
DEBTOR	§	CHAPTER 13

**Debtor's Supplement to Application to Employ
Special Litigation Counsel Pursuant to U.S. C §330**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Debtor, by and through the undersigned attorney, and files this *Debtor's Application to Employ Special Litigation Counsel Pursuant to 11 U.S.C. §330*, and would respectfully show the Court as follows:

1. On May 31, 2024, Debtor filed a Chapter 13 Bankruptcy following dismissal of a prior Chapter 13 (24-31651) for deficiency—payment advices—which has now been remedied. On April 17, 2024, Debtor filed *Notice of Removal* of state court matter, which has been associated with this pending case as Adversary Proceeding 24-03088, in which Debtor is the Plaintiff and multiple individuals and entities are Defendants.

2. It is necessary to employ special litigation counsel to represent Debtor in the above-referenced litigation matter involving a core proceeding whose primary purpose is to claw back valuable assets into the bankruptcy estate via causes of action for declaratory judgment, fraudulent transfer, and injunctive relief.

3. Debtor seeks to employ Susan C. Norman, an attorney licensed to practice in the State of Texas and in the United States District Court for the Southern District of Texas for this adversary proceeding. Moreover, Ms. Norman is experienced in state court litigation involving wrongful foreclosure matters and the litigation issues set out above, and is currently a counsel of record for Debtor in its pending state court litigation involving the wrongful foreclosure as well as the various state court matters set out above.

4. Debtor's proposed contract of employment is attached hereto as Exhibit A, incorporated for all purposes.

WHEREFORE, for these reasons, Debtor respectfully requests that the Court grant this Debtor's Application to Employ Special Litigation Counsel pursuant to 11 U.S.C. §330.

Respectfully submitted,



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Counsel for Debtor

Certificate of Service

I hereby certify that on June 7, 2024, I sent a true and correct copy of the *Debtor's Application to Employ Special Litigation Counsel Pursuant to 11 U.S.C. §330* to the below-listed individuals who have electronic service, through the Court's Pacer system, and, by First Class United States Mail, postage prepaid to those who do not use electronic service.



Susan C. Norman

David Peake
Chapter 13 Trustee
via electronic delivery to
Court@PeakeCh13Trustee.com

Parties	Counsel
James Brannon	JamesBrannon@yahoo.com
Linda Caruso,, John Caruso, and Caruso Investment Group LLC	Thomas H. Smith, III at info@RogerGJain.com
Tiffany Carroll (Scott) Fidelity National Title Agency, Inc.	Daniel J. Madden, to Dmadden@FoxRothschild.com Counsel
Estate of Isaac Dyer Eric Dyer	Rick.Dyer@Spire.net
Lenny Nunez	LeonardNunez.Amtex@gmail.com

Brian A. Spitz; Ind. and as the Managing Member of Off Market, LLC, and as President and Director of Big State Home Buyers, LLC; off Market, LLC and Nest Network, LLC; and Big State Home Buyers, LLC	James F. McMartin, IV, at james.mcmartin4@gmail.com and Aaron D. Bieber at aaron@aaronbieberlaw.com
Alejandro Sanchez;	Bruce Rusinzky, bruzinsky@jw.com and Cameron Secord, csecord@jw.com and Brandon Hakari to brandon.hakari@fnf.com and Gregory T. Brewer at gregory.brewer@fnf.com
Texas Flipco Financial, LLC and Flipco Holdco, LLC and W. Keith Maxwell, III and Todd Gibson	servicing@flipcofinancial.com and support@flipcofinancial.com, and Robert P. Debelak, III, atbobby.debelak@mhlhp.com
LPT Realty LLC d/b/a LPT Realty	U. S. Mail, Postage prepaid to Registered Agent for Service of Process, Incorp Services, Inc., at 815 Brazoa St., Ste 600, Austin. Texas 78701.

Party to be Noticed	Mailing Address
CCS/First National Bank	500 E 60th St N Sioux Falls, Sd 57104
CCS/First Savings Bank	500 E 60th St N Sioux Falls, Sd 57104
Credit First NA	6275 Eastland Rd Brookpark, Oh 44142
Credit First Na	Po Box 818011 Cleveland, Oh 44181-8011
First Premier Bank	601 S Minnesota Ave Sioux Falls, SD 57104
First Svgs Bk-blaze 500 E. 60th Street Sioux Falls, Sd 57104	601 S Minnesota Ave Sioux Falls, Sd 57104

Frost Bank Attn: Bankruptcy Dept.	PO Box 1600 San Antonio TX, 78296
FSB Blaze	5501 S Broadband Ln Sioux Falls, SD 57108
Internal Revenue Service Centralized Insolvency Office	PO Box 7346 Philadelphia, PA 19101
Internal Revenue Service	P O Box 7346 Philadelphia PA 19101-7346
IRS Insolvency Office	300 E 8th St Stop 5026Aus Austin, TX 78701-3233
Jefferson Capital Systems LLC	PO Box 7999 St Cloud, MN 56302-9617
Kohls/Capital One	N56 Ridgewood Dr Menomonee Fal, WI 53051
Linebarger Attorneys at Law	4828 Loop Central Dr Ste 600 Houston, TX 77081-1246
Merrick Bank Resurgent Capital Services	PO Box 10368 Greenville, SC 29603-036
Midland Credit Management, Inc.	PO Box 2037 Warren, MI 48090
Quantum3 Group LLC as agent for CF Medical LLC	PO Box 788 Kirkland, WA 98083-0788
U. S. Trustee	515 Rusk St # 3516, Houston, TX 77002
United States Attorney General Department of Justice	950 Pennsylvania Ave, N.W. Washington, DC
U. S. Attorney Civil Process Clerk - IRS	601 N. W. Loop 410 600 San Antonio, TX 78216
Tax Assessor-Collector Harris County Ann Harris Bennett	PO Box 4622 Houston, TX 77210-4622
Tax Assessor Collector Galveston County Cheryl E. Johnson, PCCC, CTOP	722 21st St Galveston, TX 77550-2317